

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA Title III

No. 17 BK 3283-LTS
(Jointly Administered)

Re: ECF No. 17557

**INFORMATIVE MOTION SUBMITTING CERTIFIED TRANSLATION IN
COMPLIANCE WITH THE COURT’S JULY 30, 2021 ORDER [ECF NO. 17620]**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole Title III representative of the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth and HTA the (“Debtors”) pursuant to section 315(b) of the *Puerto Rico Oversight*,

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Management, and Economic Stability Act (“PROMESA”),² respectfully submits this informative motion (the “Motion”) to submit a certified English-language translation in compliance with the Court’s July 30, 2021 *Order Granting Motion Requesting Leave to Cite Spanish Language Case Law and an Extension of Time to File A Certified Translation* [ECF No. 17620] (the “Order”), and states as follows:

1. On July 28, 2021, the Debtors filed a reply [ECF No. 17564] (the “Reply”) to the *Motion Requesting Leave to Withdraw Legal Representation and Objection to Filing No. 16638* [ECF No. 16873], filed on behalf of Jeanetta Pirtle and Humberto Medina-Torres, and in support of the *Three Hundred Fourteenth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Claims for which the Debtors Are Not Liable* [ECF No. 16638].

2. In support of the arguments raised in the Reply, the Debtors cited *Fraguada Bonilla v. Hospital Auxilio Mutuo*, 186 D.P.R. 365 (P.R. 2012), available on Westlaw in its original Spanish language (the “Spanish-Language Case Law”).

3. Concurrent with the filing of the Reply, the Debtors sought leave from this Court to rely on the Spanish-Language Case Law in its original Spanish language, and requested an extension of two (2) days, to and including today, July 30, 2021, to file a certified English-language translation of the Spanish-Language Case Law pursuant to Local District Rule 5(g) [ECF No. 17557], which the Court granted [ECF No. 4].

4. Pursuant to the Order, a certified English-language translation of the Spanish-Language Case Law must be filed on or before July 30, 2021 at 5:00 p.m. (Atlantic Standard Time).

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

5. In compliance with the Order, attached hereto as **Exhibit A** is a certified English-language translation of the Spanish-Language Case Law.

6. With the filing of this Motion, the Debtors represent that they have submitted all certified English-language translations required by the Order.

WHEREFORE, the Oversight Board respectfully requests that this Honorable Court take notice of the filing of the certified English-language translation of the Spanish-Language Case Law.

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Dated: July 30, 2021
San Juan, Puerto Rico

Respectfully submitted,

/s/ Ricardo Burgos
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CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Hermann D. Bauer
Hermann D. Bauer